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December 12, 2016

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Written *Ex Parte* Presentation**

IB Docket No. 13-213; Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks

Dear Ms. Dortch:

Over the past several weeks, Wi-Fi Alliance has written in response to the letter that Globalstar, Inc. (“Globalstar”) submitted in the above referenced proceeding on November 9, 2016. Globalstar’s November 9, 2016 letter specified changes to its proposal for providing a Terrestrial Low Power Service (“TLPS”).^{1/} Globalstar recently wrote addressing the concerns raised by Wi-Fi Alliance and others.^{2/}

Wi-Fi Alliance appreciates the additional clarification that Globalstar has provided. The proposed changes to the rules will ensure that Globalstar does not “bond” or “aggregate” its spectrum with frequencies below 2483.5 MHz in a manner that could harm the operation of Wi-Fi and other unlicensed devices in that spectrum. Accordingly, if the Commission imposes on Globalstar the limitations to which it has agreed to be subject in its November 9, 2016 and December 7, 2016 letters, Wi-Fi Alliance would not object to Commission adoption of rules permitting TLPS.

^{1/} Letter from Edgar Figueroa, President and CEO, Wi-Fi Alliance, to Marlene H. Dortch, Sec’y, FCC, IB Docket No. 13-213 (filed Nov. 22, 2016), responding to Letter from L. Barbee Ponder, Gen. Counsel and Vice President of Regulatory Affairs, Globalstar to Marlene H. Dortch, Sec’y, FCC, IB Docket No. 13-213 (filed Nov. 9, 2016). *See also*, Letter from Edgar Figueroa, President and CEO, Wi-Fi Alliance, to Marlene H. Dortch, Sec’y, FCC, IB Docket No. 13-213 (filed Dec. 5, 2016).

^{2/} Letter from L. Barbee Ponder, Gen. Counsel and Vice President of Regulatory Affairs, Globalstar to Marlene H. Dortch, Sec’y, FCC, IB Docket No. 13-213 (filed Dec. 7, 2016)

Should there be any questions, please contact me. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter has been submitted in the record of this proceeding.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Edgar Figueroa', with a long horizontal flourish extending to the right.

WI-FI ALLIANCE

Edgar Figueroa
President and CEO

efigueroa@wi-fi.org